

REMARKS

In the Office Action the Examiner noted that claims 1-22 are pending in the application, and the Examiner rejected all claims. The Examiner also objected to claims 9-10, 14-15, and 18-19 due to alleged informalities contained therein. By this Amendment, claim 21 has been cancelled without prejudice or disclaimer, and claims 1-6, 8-20, and 22 have been amended. No new matter has been presented. Thus, claims 1-20 and 22 are pending in the application. The Examiner's rejections are traversed below, and reconsideration of all rejected claims is respectfully requested.

Claim Objections

In item 2 on page 2 of the Office Action the Examiner objected to claims 9-10, 14-15, and 18-19 because the claims recite "an another user".

By this Amendment, claims 9-10, 14-15, and 18-19 have been amended and no longer recite the language objected to by the Examiner. Therefore, the Applicants respectfully request the withdrawal of the Examiner's objections to these claims.

Claim Rejections Under 35 USC §101

In item 3 on page 2 of the Office Action the Examiner rejected claims 17-20 under 35 U.S.C. §101, alleging that the claims are directed to non-statutory subject matter. The Examiner alleged that the claims recite a computer program that is considered nonstatutory functional descriptive material.

By this Amendment, claims 17-20 have been amended to place the claims in better form. Therefore, the Applicants respectfully request the withdrawal of the Examiner's rejections of these claims.

Claim Rejections Under 35 USC §112

In item 4 on pages 2-3 of the Office Action the Examiner rejected claims 3-6, 9, 14, and 18 under 35 U.S.C. §112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. The Examiner alleged antecedent basis issued for each of these claims.

By this Amendment, claims 3-6, 9, 14, and 18 have been amended and no longer recite the language as rejected by the Examiner. Therefore, the Applicants respectfully request the withdrawal of the Examiner's rejections of these claims.

Claim Rejection Under 35 USC §102

In item 6 on pages 3-4 of the Office Action the Examiner rejected claim 22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,405,175, issued to Ng (hereinafter referred to as "Ng"). The Applicants respectfully traverse the Examiner's rejection of this claim.

Claim 22 of the present application, as amended, recites "assigning at least one point to a second user in response to any of the keywords being selected and registered, by the second user, from a keywords previously presented to the second user and associated with the provided information." As discussed in detail in the following section of this Amendment in regard to claim 1 of the present application, Ng at least does not disclose a first user selecting and registering keywords from keywords presented to the first user. Therefore, it is respectfully submitted that claim 22 patentably distinguishes over Ng, and withdrawal of the Examiner's §102 rejection is respectfully requested.

Claim Rejections Under 35 USC §103

In item 8 on pages 4-7 of the Office Action the Examiner rejected claims 1-3, 8-9, 12-14, 17-18, and 20 under 35 U.S.C. §103(a) as being unpatentable over Ng in view of U.S. Patent Application Publication No. 2002/0188532, issued to Rothstein (hereinafter referred to as "Rothstein"). The Applicants respectfully traverse the Examiner's rejections of these claims.

Claim 1 of the present application, as amended, recites "presenting keywords to a first user through a network, and storing keywords selected from the presented keywords by the first user into a user-by-keyword management table relating to the first user." The Applicants respectfully submit that neither of the cited references, either alone or in combination, disclose or suggest at least these features of claim 1.

Ng discloses a method of having various users submit product and price information and product reviews for a shopping web site which presents the submitted information to online shoppers. The users who submit the information are rewarded according to the later use of the submitted information. For instance, if user A submits product information to the site, and user B

later searches for a product and finds the product information submitted by user A, user A is rewarded. If user B then clicks on a hyper-link to for the product, user A is further rewarded (Column 7, Line 60 through Column 8, Line 49).

The Examiner alleged that Ng discloses presenting keywords to a first user through a network, and storing keywords selected by the user into a user-by-keyword management table relating to the user. The Examiner supported this allegation by stating that the products/services reviewed and submitted by the users in Ng are considered as keywords. However, even if one were to characterize the product/service reviews as keywords, these product/service reviews submitted by the users in Ng are not presented to a first user to be selected and stored into a user-by-keyword management table relating to the first user, as recited in claim 1. Rather, the product/service reviews in Ng are submitted from the users without any presentation beforehand of the product/service reviews. This is apparent because the product/service reviews are not available to be presented before being submitted by the user. In other words, there is no presentation of this material to the user because it is the user who is originating the material with his/her submission thereof. This is evident from several sections of Ng. The following excerpts are merely two examples of this fact:

During session 100, consumer-user A fills out form 50 (FIG. 3) to submit new information about a product Q, including the make, model, and price, and the URL of the supplying store's product web page. The account manager adds 20 points to user A's reward count for submitting the new information (Column 7, Lines 61-67).

Later on, during session 102, user B searches for a product and finds product Q that was entered into the database by user A (Column 8, Lines 33-35).

Indeed, the purpose of the Ng disclosure is to take advantage of the process of using consumers to build and maintain the information in the database by allowing consumers to submit the product/service reviews, rather than employing people to generate the information (Column 3, Lines 8-20). As the users are submitting this information to the web site of Ng for the first time, it could not have been presented to the user beforehand. This is in direct contrast to claim 1 of the present application, which recites "presenting keywords to a first user through a network, and storing keywords selected from the presented keywords by the first user into a user-by-keyword management table relating to the first user."

In other words, in claim 1 of the present application, the keywords selected by the first user are selected from the keywords presented to the first user. Ng does not present information to be selected and stored by the user. Even in the case in which a user in Ng merely

submits a correction or update to information previously submitted to the site, it is the new information, i.e., the correction or update, that is then associated with that user, and therefore was not presented in any fashion with the previously submitted information.

Therefore, Ng does not disclose, suggest, or even contemplate “presenting keywords to a first user through a network, and storing keywords selected from the presented keywords by the first user into a user-by-keyword management table relating to the first user,” as is recited in claim 1 of the present application. Further as Rothstein apparently merely discloses the use of keyword advertising by associating an advertisement in a customer’s electronic book with specific keywords chosen by the advertiser, Rothstein does not cure the deficiencies of Ng in regard to claim 1.

Further, even if the cited references did disclose the discussed features of claim 1, and the Applicants respectfully submit that the references do not, there is no motivation to combine the two references. The Examiner alleged that it would have been obvious to one having ordinary skill in the art at the time the invention was made to modify the method as taught by Ng with keyword advertising. In support of this allegation, the Examiner stated that one would have been motivated to optimize the efficiency of the targeted advertisement by focusing the selection and ensuing delivery of the advertisement to users who are more likely to purchase the items advertised. However, the Applicants respectfully submit that the method of advertising in electronic books disclosed in Rothstein bears no relation to the method disclosed in Ng. Rothstein discloses receiving an electronic book, receiving one or more electronic ads, inserting the electronic ads into the electronic book to create an enhanced electronic book, and sending the enhanced electronic book to a customer, whereas Ng discloses presenting a product review site with information generated by rewarded users. The Applicants respectfully submit that placing ads in electronic books does not provide any process which would be of benefit, or even compatibility, with the method of Ng, and further would not serve “to optimize the efficiency of the targeted advertisement by focusing the selection and ensuing delivery of the advertisement to users who are more likely to purchase the items advertised.”

Therefore, the Applicants respectfully submit that neither of the cited references, either alone or in combination, disclose the above discussed features recited in claim 1 of the present application. Thus, the Applicants further respectfully submit that claim 1 patentably distinguishes over the cited references, and respectfully request the withdrawal of the Examiner’s §103 rejection of the claim.

Claims 2-3 and 8 depend from claim 1 and include all of the features of that claim plus additional features which are not disclosed or suggested by the cited references. Therefore, it is respectfully submitted that claims 2-3 and 8 also patentably distinguish over the cited references.

Claims 9, 12-14, 17-18, and 20 of the present application, as amended, also recite similar features to those discussed in claim 1 regarding a user selecting keywords from a presentation of available keywords. Therefore, the Applicants respectfully submit that claims 9, 12-14, 17-18, and 20 also patentably distinguish over the cited references.

In item 9 on pages 7-8 of the Office Action the Examiner rejected claims 4-7 under 35 U.S.C. §103(a) as being unpatentable over Ng and Rothstein as applied to claim 1, and further in view of U.S. Patent Application Publication No. 2001/0051911, issued to Marks et al. (hereinafter referred to as "Marks"). The Applicants respectfully traverse the Examiner's rejections of these claims.

As previously discussed in this Amendment, claim 1 of the present application patentably distinguishes over Ng and Rothstein. Further, as Marks apparently merely discloses associating an advertisement with specific keywords chosen by the advertiser in a search engine which charges different rates for each keyword, the Applicants respectfully submit that Marks does not cure the deficiencies of Ng and Rothstein in regard to claim 1. Therefore, as claims 4-7 depend from claim 1 and include all of the features of that claim plus additional features which are not disclosed or suggested by the cited references, it is respectfully submitted that claims 4-7 also patentably distinguish over the cited references.

In item 10 on pages 8-10 of the Office Action the Examiner rejected claims 10-11, 15-16, and 19-20 under 35 U.S.C. §103(a) as being unpatentable over Rothstein in view of Ng. The Applicants respectfully traverse the Examiner's rejections of these claims.

Claims 10-11, 15-16, and 19-20 of the present application, as amended, also recite similar features to those discussed in claim 1 regarding a user selecting keywords from a presentation of available keywords. Therefore, as neither Ng nor Rothstein disclose, suggest, or even contemplate at least these features of these claims, the Applicants respectfully submit that claims 10-11, 15-16, and 19-20 also patentably distinguish over the cited references.

In item 11 on pages 10-11 of the Office Action the Examiner rejected claim 21 under 35 U.S.C. §103(a) as being unpatentable over Rothstein in view of Marks. By this Amendment, claim 21 has been cancelled without prejudice or disclaimer.

Summary

In accordance with the foregoing, claim 21 has been cancelled without prejudice or disclaimer, and claims 1-6, 8-20, and 22 have been amended. No new matter has been presented. Thus, claims 1-20 and 22 are pending in the application.

There being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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